UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

In Re: Gerard J Morelli	:	Case No: 16-51527
Debtor(s)	:	Chapter 13 Judge: C KATHRYN PRESTON
	:	Filed 10/5/16 Amended plan

CHAPTER 13 TRUSTEE'S OBJECTION TO CONFIRMATION

Now comes Frank M. Pees, Standing Chapter 13 Trustee, and objects to the confirmation of the plan and requests that the Court enter an Order denying confirmation for the reasons set forth below and dismissing the case, pursuant to 11 U.S.C. §1307. This objection supersedes any prior objection filed in this case by the Trustee.

Above median income______ Below median income__X__

__X___ **11 U.S.C. §1325(a)(1)**-Plan does not comply with all provisions of Chapter 13 of Title 11 and the other applicable provisions of Title 11:

__X__Plan takes over 60 months to complete. **77 mos due to claims as filed. (Note: If Debtor's objs to IRS and State of OH claims are granted, length = 60 mos)**
(Note: Bar date passed)

Pursuant to LBR 3015-2(a), amendments necessary to place the plan in a posture for confirmation must be filed at least ten (10) days prior to the hearing on confirmation set for December 01, 2016, unless Debtor(s) have entered into an Agreed Order with the Trustee and so are bound by the terms of that Order.

Therefore, the Trustee prays that confirmation is denied and this case be dismissed for cause pursuant to §1307(c).

TERMS OF THE PLAN:

Plan Payments: 477.21 mo - 2 mos; 496.88 mo - 2 mos; 669 mo - rem

Best Interest Dividend: 0% Dividend: 100%

Length: 77 Months

Dated: October 11, 2016

Respectfully submitted,

/s/ Frank M. Pees
Frank M. Pees
Chapter 13 Trustee
130 East Wilson Bridge Road #200
Worthington, Ohio 43085
(614) 436-6700
trustee@ch13.org

CERTIFICATE OF SERVICE

The undersigned hereby certified that on the date shown below a copy of the Trustee's Objection to Confirmation was served electronically on the Office of the United States Trustee and Debtor's attorney, and on the Debtor(s) at the address as currently shown in the Trustee's records by regular first class mail, postage prepaid.

Dated: October 11, 2016

/s/ Frank M. Pees
Frank M. Pees
Chapter 13 Trustee
130 East Wilson Bridge Road #200
Worthington, Ohio 43085-6300